

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF OKLAHOMA**

IN RE: )  
 )  
CM HEAVY MACHINERY, LLC, ) Case No. 24-80617  
 ) Chapter 11  
Debtor. )

**UNITED STATES TRUSTEE'S LIMITED OBJECTION TO  
APPLICATION TO APPROVE EMPLOYMENT OF  
ZACHARY RICHARDSON TO ABOVE-CAPTIONED DEBTOR**

Ilene J. Lashinsky, United States Trustee for Region 20 (the “U.S. Trustee”) hereby files this limited objection to the Application to Approve Employment of Zachary Richardson to Above-Captioned Debtor, Doc. No. 178 (the “Employment Application”). In support of this objection, the U.S. Trustee states as follows:

**PROCEDURAL AND FACTUAL BACKGROUND**

1. Pursuant to 28 U.S.C. § 586, the U.S. Trustee has the responsibility to supervise the administration of cases filed pursuant to Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”).
2. On August 8, 2024, CM Heavy Machinery, LLC (the “Debtor”) filed a voluntary petition for relief pursuant to Chapter 11 of the Bankruptcy Code.
3. No creditors’ committee has been appointed.
4. Through the Employment Application filed on June 9, 2025, the Debtor seeks to retain Zachary Richardson (“Richardson”) to “perform professional accounting and financial advisory services for the Debtor.”

## **LIMITED OBJECTION TO REQUESTED RELIEF**

5. The U.S. Trustee objects, on a limited basis, to the employment of Richardson pursuant to 11 U.S.C. § 327 and FED. R. BANKR. P. 2014.

6. In the Declaration attached to the Employment Application, Richardson states “[m]y work with the Debtor is limited to this proposed engagement as collection agents.” *See* Declaration at ¶ 7.

7. The U.S. Trustee believes that this is likely a typographical error and that the Debtor intends to retain the services of Richardson and Richardson intends to provide accounting and tax services rather than collection activity.

8. However, given that this provision appears in the sworn declaration of Richardson, the scope of his proposed employment should be clear.

9. The U.S. Trustee has no objection to Richardson performing accounting and tax work for the Debtor and if that is the capacity in which he is to be retained, his Declaration should be amended to reflect the same.

WHEREFORE, for the reasons set forth herein, the U.S. Trustee objects on this limited basis to the Employment Application.

ILENE J. LASHINSKY  
UNITED STATES TRUSTEE

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